



# Santa Ana Watershed Project Authority

CELEBRATING 40 YEARS OF INNOVATION, VISION, AND WATERSHED LEADERSHIP

May 4, 2011

Mr. James Herink, Staff Counsel

Terry Catlin  
Commission  
Chair  
Office of Chief Counsel  
State Water Resources Control Board  
1001 I Street, 22<sup>nd</sup> Floor  
Sacramento, CA 95814

Celeste Cantú  
General  
Manager

Subject: SWRCB/OCC Files A-2144(a) and A-2144(b) (Consolidated)

Dear Mr. Herink:

Eastern  
Municipal  
Water  
District

On behalf of Santa Ana Watershed Project Authority, I urge the State Water Resources Control Board to affirm the more stringent permit conditions issued by the Central Valley Regional Water Quality Control Board in December 2010 for the Sacramento Regional County Sanitation District's (SRCSD) wastewater treatment plant. The permit contains critical measures that will require SRCSD to implement the much needed treatment plant upgrades.

Inland  
Empire  
Utilities  
Agency

As you know, SRCSD is the largest discharger of wastewater into the Delta. It is also the only major discharger in the region that has yet to upgrade to advanced treatment technologies. This is not just a Sacramento issue. This permit is critical to the health of the Delta ecosystem. This permit is also a vital issue for the millions of Californians who rely on water from the Delta. Water supplies moved across the Delta are used by more than 25 million Californians, including many in our region.

Orange  
County  
Water  
District

San  
Bernardino  
Valley  
Municipal  
Water  
District

Maintaining a high-quality source supply is fundamental for sound water management. Many organizations and state and federal agencies have voiced concerns regarding SRCSD's current practices. Last year, the California Department of Public Health expressed to the Central Valley Regional Water Quality Control Board its well-reasoned concerns about the untreated pathogens that are presently contained in the discharge from this facility. Removing pathogens from this wastewater stream is a basic requirement for human health protection, both for recreational purposes in the Delta as well as for downstream drinking water uses. Downstream drinking water treatment plants rely on multiple barriers to ensure public health protection. Controlling sources of contamination is the first barrier.

Western  
Municipal  
Water  
District

The approved permit correctly follows the best available science, showing that ammonia and other pollutants have significantly altered the Delta's food web – contributing to the overall decline of the estuary's health. For the last few decades, the state and federal water project



operations have been the focus of regulatory agencies in an attempt to revive fish populations. It's now clear that the only way to make long-term improvements is to address all the factors that impact the Delta ecosystem – including limiting the amounts of ammonia and nitrate that are allowed to flow into the Delta and its waterways.

Given the growing body of evidence demonstrating that the current wastewater discharges are having a detrimental effect on the Delta ecosystem, the required treatment upgrades must occur without delay. Allowing pollutant loading to continue to increase for another 10 years would further compound the impacts on the Delta ecosystem. We urge the State Water Resources Control Board to require implementation of interim treatment measures and a shorter compliance schedule, particularly for nitrogen removal.

Organizations, public agencies and leaders throughout the state have been working diligently towards a comprehensive solution to the overall Delta crisis. Reducing ammonia, nitrates, and pathogens in the Delta is critical to that effort, which is why it is essential that your Board uphold the permit approved by the Central Valley Regional Water Quality Control Board and require implementation of interim measures and a shortened compliance schedule to reduce nitrogen discharges.

Thank you for your consideration.

Sincerely,



Celeste Cantu

Ana Watershed Project Authority

cc:

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